

F I L E D
Clerk
District Court

MAR 07 2006

Robert D. Bradshaw
PO Box 473
1530 W. Trout Creek Road
Calder, Idaho 83808
Phone 208-245-1691

For The Northern Mariana Islands
By _____
(Deputy Clerk)

Plaintiff, Pro Se

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

ROBERT D. BRADSHAW

) Civil Action No. 05-0027

Plaintiff

v.

**COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS (hereafter referred to
as the CNMI);**

) **EX PARTE MOTION EXTENDING
TIME UNDER LOCAL RULE 7.1.h.3(b)
AND FED. R. CIV. P. 6(b);
APPLICATION FOR INCREASE OF
TIME UNDER LOCAL RULE 7.1.h.2**

Defendants

)

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)

A. The undersigned plaintiff, Robert D. Bradshaw, certifies as follows:

1. The address and phone number of Plaintiff Bradshaw, who is without counsel, is:

PO Box 473
1530 Trout Creek Road
Calder, ID 83808
Telephone: 208-245-1691

2. Defendants Nicole Forelli, William C. Bush, D. Douglas Cotton, and Pamela Brown
are represented by the CNMI Attorney General's Office whose address and relevant numbers
are:

OFFICE OF THE ATTORNEY GENERAL-CIVIL DIVISION
2nd Floor, Hon. Juan A. Sablan Memorial Bldg.
Caller Box 10007
Saipan, MP 96950
Telephone: 670-664-2341
Facsimile: 670 664 2349

3. Defendant Jay Sorensen's address and relevant numbers are:

c/o Shanghai
PO Box 9022
Warren, MI 48090-9022
Telephone: (86) 21 5083-8542
Facsimile: (86) 21 5083-8542

4. Defendants John Manglona, Alex Castro, and Timothy H. Bellas are represented by G. Patrick Civille, Civille & Tang, PLLC, whose address and relevant numbers are:

Civille & Tang, PLLC
2d Floor, Cabrera Center
PMB 86, PO Box 10003
Saipan, MP 96950
Telephone: 670-235-1725
Facsimile: 670-235-1726

5. Defendant L. David Sosebee's address is as follows:

L. David Sosebee
PO Box 3185
Bryan, TX 77805

f. The addresses of Robert A. Bisom and Andrew Clayton are not known at this time. They are yet to be served by publication.

**B. FACTS SHOWING EXISTENCE AND NATURE OF THE CLAIMED
EMERGENCY OR REASON FOR EX PARTE APPLICATION**

1. Reference is made to the "Order Granting Defendant Sorensen's Motion to Dismiss with Leave to Amend" as issued by the Court on Feb 21, 2006, with a deadline for the submission of a Second Amended Complaint within twenty days from Feb 21, 2006.

2. Plaintiff hereby requests that the Court extend and enlarge the time to prepare and submit the Second Amended Complaint to the Court to April 1, 2006.

3. The reason for this extension is that the order just reached plaintiff on March 1, 2006 from Saipan. Too, the complaint and its particulars are quite complex and lengthy. As Plaintiff is not an attorney, he is in the process of obtaining some local legal assistance in revising the complaint to conform to the Court Order. This will take some time in order for this assistance to materialize and be completed.

4. This extension of time, if granted, should have no impact on other deadlines previously set.

C. APPLICATION TO INCREASE TIME PURSUANT TO LOCAL RULE 7.1.H.2

1. Based upon the facts set forth herein, Plaintiff makes this application to increase time and state:

- a. No other extensions of time have been sought by Plaintiff in this matter.
- b. The reasons for this extension are set forth herein.
- c. Granting this extension should not effect any scheduled dates.

WHEREFORE, based upon the foregoing, Plaintiff respectfully requests that the Court grant this Ex Parte Motion Extending Time and enter an Order extending Defendants' deadline for filing the Second Amended Complaint.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Dated this 6th day of March 2006 at Calder, Idaho.



Robert D. Bradshaw
ROBERT D. BRADSHAW

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of March 2006, I caused to be served a true copy of the foregoing document by US Mail Postage Paid to each of the following:

Jay H. Sorensen, c/o Shanghai, PO Box 9022, Warren, MI 48090-9022
Kristin St Peter, Asst Attorney General, Caller Box 10007, Capitol Hill, Saipan, MP 96950
Patrick Civille, Civille & Lang, PLLC, PMB 86, PO Box 10003, Saipan, MP 96950
L. David Sosebee, Box 3185, Bryan, TX 77805



Robert D. Bradshaw
Robert D. Bradshaw, Plaintiff, Pro Se